



RE: MB-RM-10836

In the matter of:
AdiCorp requesting changes
in CFR 47, Part 2 and 90.

McCarthy Radio Enterprises is an engineering contractor for 13 Part 73 radio stations and one LPTV in the metropolitan Chicago area and northeast Illinois. It's principal, Michael G. McCarthy, is certified by the Society of Broadcast Engineers as a Senior Radio Engineer and Audio Engineer. Heretofore are the comments of MRE.

MRE opposes AdiCorp's Emergency Vehicle Signaling Service petition. The premise is ill-founded and makes a great deal of presumptions in the real world which are not duplicable in a laboratory.

First, in areas where RF fields are exceedingly high, such as near heavily congested tower farms or downtown areas for FM or near AM transmitter sites, the signal which the petitioner proposes will yield little, if any advance warning to motorists. Many such sites lie near or along main arterial roads, expressways, or other heavily traveled routes besides city centers.

2nd, the reception of EAS signaling and/or formatted messages from LP1 and LP2 relay stations at the main studio or control point of radio, television, and cable stations will be inhibited by emergency vehicles passing near those stations studios and/or control points. Because broadcasters (both radio AND TV) AND cablecasters rely on a matrix of LP broadcast stations for receiving EAS messages, this would be of great importance to the EAS matrix and ultimately general homeland security. It is completely outside the purview of any local public safety agency to circumvent, prevent or deny the delivery of an EAS formatted call to action message to the public at large via participating stations who choose to relay such messages. The ADiCorp. system will do just that without prejudice to any EAS message regardless of whether the source is the President or the local weather forecast office.

Beyond the aforementioned comments, MRE supports fully the comments filed by the Society of Broadcast Engineers on this instant petition. Particularly the suggestion of a NPRM for a nationwide Part 90 channel for such a system in the underused 800 Mhz allocated public safety spectrum.

Respectfully submitted,

/S/

Michael G. McCarthy, CSRE, CEA
Principal and President